

align number UNITED STATES

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

[illegible]

Judge: Waverly D. Crenshaw, Jr.

Defendants.

5. Mutual pseudonymity is necessary to protect Doe's identity; requiring disclosure of Defendants' names would functionally disclose Doe's identity as well.

6. In accordance with Local Rules and the Federal Rules of Civil Procedure, Doe stands ready to file her identifying information under seal if the Court so requires.

WHEREFORE, for the reasons stated herein and in the accompanying Memorandum of Law, Plaintiff respectfully requests that the Court grant leave to proceed under a pseudonym and enter any additional protective orders necessary to maintain the confidentiality of Doe's identity.

A Proposed Order is attached for the Court's convenience.

Dated: March 4, 2025

Respectfully submitted,

*/s/ Chanelle Acheson*  
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